



## ACER INCORPORATED 2015 CONFLICT MINERALS REPORT

### **Introduction**

Acer has developed this Conflict Minerals Report (CMR), covering the period from January 1 to December 31 of 2015, for the purpose of describing our due diligence efforts on the source and chain of custody of the gold, columbite-tantalite (coltan), cassiterite, wolframite, tantalum, tin, and tungsten (collectively referred to as “3TG”) contained in our products that we have reason to believe may have originated from the Democratic Republic of the Congo (“DRC”) or an adjoining country (collectively defined as the “Covered Countries”) and may not have come from recycled or scrap sources.

Established in 1976, Acer is dedicated to the research, design, marketing, sale and support of innovative products and services that enhance people's lives. Acer employs 7,000 people and ranks No. 5 for total PCs globally (IDC 2015). Revenues for 2015 reached US\$7.98 billion. With the company's Build Your Own Cloud (BYOC) mission, Acer is transforming into a "hardware + software + services" company and actively seeking to embrace new opportunities in the era of the ICT industry. Please visit [www.acer.com](http://www.acer.com) for more information.

### **Reasonable Country of Origin Inquiry (RCOI)**

Acer conducted a reasonable country of origin inquiry (RCOI) that employed a combination of measures to determine whether the necessary 3TG in Acer's products originated from the Covered Countries. As a member of the Conflict-Free Sourcing Initiative (CFSI), Acer's primary means of determining country of origin of necessary 3TG was by conducting a supply-chain survey with direct suppliers using the CFSI Conflict Minerals Reporting Template (CMRT). The smelters or refiners (SORs) that were identified as part of this supply chain survey were compared to the list of known SORs that is maintained by the CFSI and those that have had their mines of origin verified by the [Conflict-Free Smelter program \(CFSP\)](#).

Due to the results of its RCOI, Acer has reason to believe that its necessary 3TG may have originated in the DRC or Covered Countries and has reason to believe that they may not be from recycled or scrap sources. Consequently, Acer has exercised due diligence on the source and chain of custody of its necessary 3TG that conforms to a nationally or internationally recognized due diligence framework, and describes those activities in this CMR.

## **Design of Acer's Due Diligence Measures**

Acer developed and implemented a conflict minerals due diligence program to help protect human rights and to avoid contributing to conflict in the DRC or Covered Countries as a result of its decision when sourcing the necessary 3TG for the manufacture of its products. Acer designed its due diligence measures to be in conformance with the internationally recognized due diligence framework in the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (“OECD Guidance”) and related Supplements for each of the minerals as they relate to downstream companies in the supply chain.

As a brand company, Acer's supply chain has multiple tiers between the company and the mines. Acer does not purchase raw ore or unrefined 3TG, and does not purchase materials in the DRC or Covered Countries. The origin of 3TG cannot be determined with any certainty once the raw ores are smelted, refined and converted to ingots, bullion or other conflict mineral containing derivatives. The SORs are consolidating points for raw ore and are in the best position in the total supply chain to know the origin of the ores. Our supplier engagement includes the suppliers with which Acer has a direct relationship and has influence over purchasing decisions. These suppliers are considered first tier and we rely on them to help us identify and assess the risk in the supply chain and provide information on the SORs that supply the 3TG contained in our products.

Acer's due diligence includes the following elements of the 5-Step OECD Framework:

1. Establish strong company management systems;  
Adopt and commit to a supply chain policy for identifying and managing risks, structure internal management systems to support supply chain due diligence, establish a system of controls and transparency over the supply chain, strengthen company engagement with suppliers, and establish a grievance mechanism.
2. Identify and assess risks in the supply chain;  
Identify the SORs in the supply chain, identify the scope of the risk assessment of the mineral supply chain, assess whether the SORs have carried out all elements of due diligence, and where necessary, carry out joint spot checks at the mineral SOR's own facilities.

3. Design and implement a strategy to respond to identified risks;  
Report findings to designated senior management, devise and adopt a risk management plan, implement the risk management plan, monitor and track performance of risk mitigation, report back to designated senior management and consider suspending or discontinuing engagement with a supplier after failed attempts at mitigation, and undertake additional fact and risk assessments for risks requiring mitigation or after a change of circumstances.
4. Carry out independent third-party audit of smelter/refiner's due diligence practices; and  
Plan an independent third party audit of the SOR's due diligence.
5. Report annually on supply chain due diligence.  
Annually report or integrate, where practicable, into annual sustainability or corporate responsibility reports, additional information on due diligence.

### **Description of Due Diligence Measures Performed**

During the reporting period, Acer performed the following due diligence measures:

1. Established strong company management systems
  - Continued support of an internal team that includes oversight by senior staff to manage all aspects of Acer's conflict minerals due diligence program;
  - Reviewed Acer's conflict minerals policy to ensure continued relevancy in the third year of the program ([available on Acer's sustainability website](#));
  - Continued to maintain and monitor a grievance mechanism via Acer's general corporate responsibility email address ([cr@acer.com](mailto:cr@acer.com)) to be used specifically by any interested party (e.g. affected person or whistleblower) to raise concerns regarding business conduct in Acer's supply chain, including in relation to the extraction and supply of minerals; and
  - Provided follow-up training on its conflict minerals policy, procedure and global trend to all of the internal personnel with responsibility over conflict minerals program activities as well as all of the 1<sup>st</sup> tier suppliers over which Acer has direct influence.

## 2. Identify and assess risks in the supply chain

- Conducted Acer's fourth conflict minerals survey, requesting information on Acer's supply chain using the CMRT and received 95% direct supplier response rate. Due to the onboarding of several new suppliers with limited conflict minerals experience, Acer was unable to achieve a 100% response rate in 2015. Acer will continue to build capacity with these suppliers to ensure a response during the next survey round. We increased the response rate from 87% to 95% in 2015. For the suppliers that did not respond, we deducted points from their 2015 CSR scorecard to guide them to take actions to complete the CMRT;
- Consolidated the supplier survey responses and compared the results with the CFSI known SOR lists and the CFSP to verify true SORs, mines of origin, and to determine the conflict-free status;
- Acer continues to conduct audits to verify the presence of an implemented due diligence program, including the existence of their own conflict minerals policy, evidence of the design and implementation of supply chain due diligence program that includes a risk management plan to identify and address red flags, and existence of conflict minerals reporting;
- Continued conducting research on alleged SORs, contacting them via telephone and/or email to verify them as true SORs, identifying SOR alias names and relating them to alleged or true SORs, contacting alleged SORs via telephone, email or conduct onsite visits to encourage them to cooperate with the CFSI and participate in the CFSP, and assisting SORs with initiating participation in the CFSP; and
- While assessing our SORs for 2015, we became aware of two high-risk SORs that required action. Due to the findings described below, in 2016, we directed our suppliers to discontinue all business with these high-risk SORs.
  - i. Fidelity Printers and Refiners was found to be linked to Sino Zimbabwe Development (Pvt) Ltd via a \$500M partnership launched in 2009. Due to human rights concerns, Sino Zimbabwe was listed on the Specially Designated Nationals List by the Office of Foreign Assets Control (OFAC) of the US Department of the Treasury, which administers and enforces trade sanctions on individuals and entities that are threats to national security, foreign policy, or the economy of the United States. Acer has determined

that it shall prohibit the existence in its supply chain of any links to OFAC listed entities.

- ii. In April 2015, the Dubai Multi Commodities Centre (DMCC) removed Kaloti Precious Metals from its Dubai Good Delivery List due to not meeting DMCC’s practical guidance for market participants in the gold and precious metals industry. This brought into question the refiner’s ability to meet the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas and its status with respect to other social and ethical expectations.

3. Design and implement a strategy to respond to identified risks

- Improved our supplier feedback to include specific line-by-line status of each SOR identified by our suppliers asking them to review and engage with whom we identified for “outreach required” as part of Acer’s conflict minerals due diligence process;
- Implemented conflict minerals key performance indicators (KPIs) within Acer’s supplier CSR scorecard to minimize risk by driving better due diligence and reporting within the supply chain. A summary of the results of our supplier CSR scorecards is provided in Table 1 below; and

**Table 1: CSR Scorecard Results**

Score Category	Score	Suppliers
Needs improvement immediately	< 7	3%
Needs Improvement	7-8	25%
Good	9-10	71%

- Finalized Acer’s risk management plan in May or 2016. The plan includes a list of conditions which constitute red-flag conditions for Acer, recommended corrective action and KPIs to measure progress.

4. Carry out independent third-party audit of smelter/refiner’s due diligence practices

- Continued financial support of the CFSP as an active member of the EICC.

## 5. Report annually on supply chain due diligence

- Published an updated list of known SORs that have been identified in Acer's supply chain as a result of its due diligence measures, along with a status of each SOR (see Appendix B); and
- Reported on Acer's supply chain due diligence via this CMR.

### **In-Region Clean Minerals Trade**

Acer continues to believe that projects and organizations that seek to boost economic development and help stabilize the Great Lakes Region, as well as develop systems that feed into the CFSI tools and processes are essential. As a result, Acer continues to follow and/or support the organizations below.

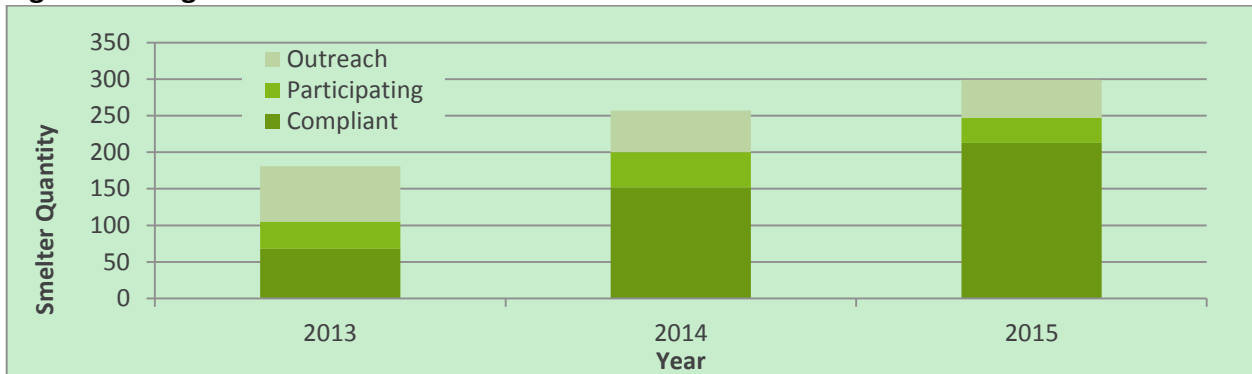
- *ICGLR-OECD-UN Joint Forum on Responsible Mineral Supply Chains* to learn about experiences with regards to implementing the OECD Guidance and opportunities to contribute to in-region programs; and
- *Public-Private Alliance for Responsible Minerals Trade (PPA)*, an organization whose goal is to award funding for in-region programs that seek to spur economic development and develop minerals tracing systems

### **Results of Due Diligence Measures**

As a result of its due diligence measures in 2015, Acer was able to identify 299 unique SORs in its supply chain that it has reason to believe are legitimate SORs. Acer based this decision off of the information received through the consolidation of its supplier survey responses and industry information made available to it through its CFSI membership and working group participation.

For the 2015 reporting year, Acer is providing additional detail regarding the known SORs in its supply chain. Figure 1 includes a chart of our progress year-over-year and Figure 2 includes a chart of the individual metal performance for the current reporting year. Both charts include the SOR status as of May 3, 2016 and clearly show the excellent progress Acer has made as a result of its due diligence efforts.

**Figure 1: Progress**



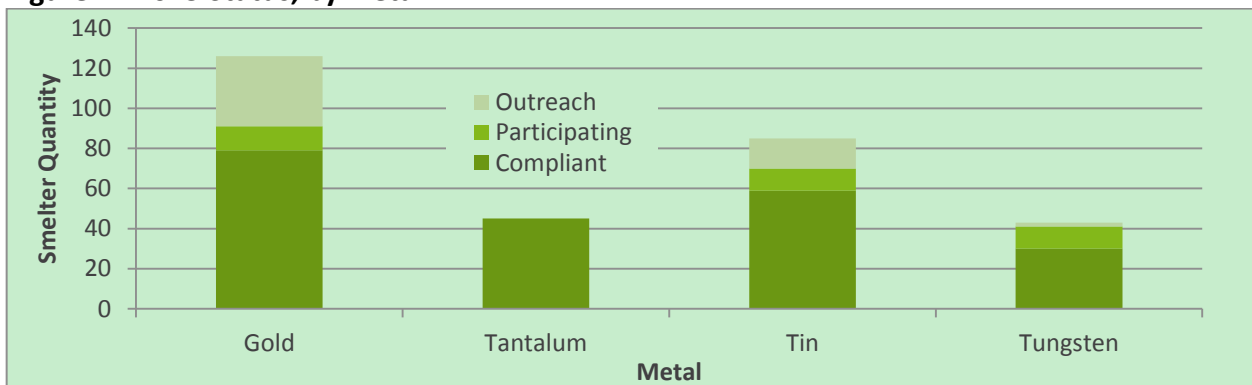
\*Status is defined as follows:

Compliant: Smelters or refiners that are compliant with the Conflict-Free Smelter Program (CFSP) assessment protocols or have been validated by a similar validation program (e.g., the London Bullion Market Association’s *Responsible Gold Programme* or the Responsible Jewelry Council’s *Chain-of-Custody Certification Program*)

Participating: Smelters and refiners that have committed to undergo a CFSP audit or that are in communication

Outreach: Smelters or refiners that have not agreed to participate, but Acer is assisting with targeted outreach

**Figure 2: 2015 Status, by metal**



\*Status is defined as follows:

Compliant: Smelters or refiners that are compliant with the Conflict-Free Smelter Program (CFSP) assessment protocols or have been validated by a similar validation program (e.g., the London Bullion Market Association’s *Responsible Gold Programme* or the Responsible Jewelry Council’s *Chain-of-Custody Certification Program*)

Participating: Smelters and refiners that have committed to undergo a CFSP audit or that are in communication

Outreach: Smelters or refiners that have not agreed to participate, but Acer is assisting with targeted outreach

Acer included the following appendices to this CMR that provide additional details on the direct suppliers and SORs in Acer’s supply chain:

- Appendix A – Supply Chain Indicators – additional metrics Acer has identified to track progress within its supply chain.
- Appendix B – Smelter/Refiner List & Countries of Origin – the complete list of SORs that were confirmed to be part of Acer’s supply chain during the 2015 reporting period, including their location and status. The list also includes the known countries of origin for those SORs whose 3TG sourcing origins have been validated by the CFSP.

## **Future Due Diligence and Risk Mitigation Measures**

Acer will continue to take steps during the next reporting period to improve the due diligence conducted and further mitigate the risk in its supply chain, including:

- Continue working with suppliers to increase the accuracy of SOR identification, support SOR engagement, and drive them to source from SORs with a conflict-free status;
- Continue to identify and engage true SORs to encourage them to participate in the CFSP, with the goal of obtaining a conflict-free status;
- Continue supplier audits to evaluate conflict minerals policies and practices within the supply chain downstream from the SORs.
- Continue to refine conflict minerals due diligence KPIs included in Acer's direct supplier corporate social responsibility scorecard, to prioritize conflict minerals and drive continuous improvement; and
- Investigate the potential of using publically available incident report summaries to accompany Acer's due diligence program to further address risk upstream.



**Appendix A – Supply Chain Indicators**

Indicator	Result	
	2014	2015
Number of supplier audits conducted	72	71
Number of suppliers in compliance with Acer's policy or program	63	65
Percentage of suppliers that have adopted a conflict minerals policy	96%	97%
- Policy is publically available on supplier's website	81%	78%
Suppliers that have required their direct suppliers to source from smelters validated by an independent third party audit	60%	84%
Percentage of validated smelters in the supply chain that are known to not be sourcing from covered countries	39%	52%
Percentage of validated smelters in the supply chain that are known to be sourcing from covered countries	8%	11%
Quantity of smelters that are known to be sourcing from covered countries (Percentage that are validated)	20 (100%)	23 (100%)

## Appendix B – Smelter/Refiner List

As part of Acer’s conflict minerals due diligence efforts, we have published a list of the tantalum, tin, tungsten and gold smelters/refiners that have been confirmed to be present in our supply chain. On an annual basis, this list will be updated with the latest status. For the most current information on each smelter/refiner, please visit the Conflict-Free Sourcing Initiative website at [www.conflictreesourcinginitiative.org](http://www.conflictreesourcinginitiative.org).

\*Each status is defined as follows:

Compliant: Smelters or refiners that are compliant with the Conflict-Free Smelter Program (CFSP) assessment protocols or have been validated by a similar validation program (e.g., the London Bullion Market Association’s *Responsible Gold Programme* or the Responsible Jewelry Council’s *Chain-of-Custody Certification Program*)

Participating: Smelters and refiners that have committed to undergo a CFSP audit or that are in communication

Outreach: Smelters or refiners that have not agreed to participate, but Acer is assisting with targeted outreach

Metal	Smelter Name	Status*	Country
Gold	Advanced Chemical Company	Participating	UNITED STATES
Gold	Aida Chemical Industries Co., Ltd.	Compliant	JAPAN
Gold	Aktyubinsk Copper Company TOO	Outreach	KAZAKHSTAN
Gold	Al Etihad Gold Refinery DMCC	Outreach	UNITED ARAB EMIRATES
Gold	Allgemeine Gold-und Silberscheideanstalt A.G.	Compliant	GERMANY
Gold	Almalyk Mining and Metallurgical Complex (AMMC)	Outreach	UZBEKISTAN
Gold	AngloGold Ashanti Córrego do Sítio Mineração	Compliant	BRAZIL
Gold	Argor-Heraeus SA	Compliant	SWITZERLAND
Gold	Asahi Pretec Corporation	Compliant	JAPAN
Gold	Asahi Refining Canada Limited	Compliant	CANADA
Gold	Asahi Refining USA Inc.	Compliant	UNITED STATES
Gold	Asaka Riken Co., Ltd.	Compliant	JAPAN
Gold	Atasay Kuyumculuk Sanayi Ve Ticaret A.S.	Outreach	TURKEY
Gold	Aurubis AG	Compliant	GERMANY
Gold	Bangko Sentral ng Pilipinas (Central Bank of the Philippines)	Compliant	PHILIPPINES
Gold	Bauer Walser AG	Outreach	GERMANY
Gold	Boliden AB	Compliant	SWEDEN
Gold	C. Hafner GmbH + Co. KG	Compliant	GERMANY
Gold	Caridad	Outreach	MEXICO
Gold	CCR Refinery - Glencore Canada Corporation	Compliant	CANADA
Gold	Cendres + Métaux SA	Participating	SWITZERLAND
Gold	Chimet S.p.A.	Compliant	ITALY
Gold	Chugai Mining	Participating	JAPAN
Gold	Daejin Indus Co., Ltd.	Participating	SOUTH KOREA
Gold	Daye Non-Ferrous Metals Mining Ltd.	Outreach	CHINA
Gold	DODUCO GmbH	Compliant	GERMANY
Gold	Dowa	Compliant	JAPAN
Gold	DSC (Do Sung Corporation)	Participating	KOREA, REPUBLIC OF
Gold	Eco-System Recycling Co., Ltd.	Compliant	JAPAN
Gold	Elemental Refining, LLC	Compliant	UNITED STATES
Gold	Emirates Gold DMCC	Compliant	UNITED ARAB EMIRATES

<b>Metal</b>	<b>Smelter Name</b>	<b>Status*</b>	<b>Country</b>
Gold	Faggi Enrico S.p.A.	Participating	ITALY
Gold	Fidelity Printers and Refiners Ltd.	Outreach	ZIMBABWE
Gold	Gansu Seemine Material Hi-Tech Co., Ltd.	Outreach	CHINA
Gold	Geib Refining Corporation	Outreach	UNITED STATES
Gold	Great Wall Precious Metals Co., Ltd. of CBPM	Outreach	CHINA
Gold	Guangdong Jinding Gold Limited	Outreach	CHINA
Gold	Guoda Safina High-Tech Environmental Refinery Co., Ltd.	Outreach	CHINA
Gold	Hangzhou Fuchunjiang Smelting Co., Ltd.	Outreach	CHINA
Gold	Heimerle + Meule GmbH	Compliant	GERMANY
Gold	Heraeus Ltd. Hong Kong	Compliant	CHINA
Gold	Heraeus Precious Metals GmbH & Co. KG	Compliant	GERMANY
Gold	Hunan Chenzhou Mining Co., Ltd.	Outreach	CHINA
Gold	Hwasung CJ Co., Ltd.	Participating	KOREA, REPUBLIC OF
Gold	Inner Mongolia Qiankun Gold and Silver Refinery Share Company Limited	Outreach	CHINA
Gold	Ishifuku Metal Industry Co., Ltd.	Compliant	JAPAN
Gold	Istanbul Gold Refinery	Compliant	TURKEY
Gold	Japan Mint	Compliant	JAPAN
Gold	Jiangxi Copper Company Limited	Compliant	CHINA
Gold	JSC Ekaterinburg Non-Ferrous Metal Processing Plant	Compliant	RUSSIAN FEDERATION
Gold	JSC Uralelectromed	Compliant	RUSSIAN FEDERATION
Gold	JX Nippon Mining & Metals Co., Ltd.	Compliant	JAPAN
Gold	Kaloti Precious Metals	Outreach	UNITED ARAB EMIRATES
Gold	Kazakhmys Smelting LLC	Outreach	KAZAKHSTAN
Gold	Kazzinc	Compliant	KAZAKHSTAN
Gold	Kennecott Utah Copper LLC	Compliant	UNITED STATES
Gold	KGHM Polska Miedź Spółka Akcyjna	Outreach	POLAND
Gold	Kojima Chemicals Co., Ltd.	Compliant	JAPAN
Gold	Korea Metal Co., Ltd.	Participating	KOREA, REPUBLIC OF
Gold	Kyrgyzaltyn JSC	Outreach	KYRGYZSTAN
Gold	L' azurde Company For Jewelry	Outreach	SAUDI ARABIA
Gold	Lingbao Gold Company Limited	Outreach	CHINA
Gold	Lingbao Jinyuan Tonghui Refinery Co., Ltd.	Outreach	CHINA
Gold	LS-NIKKO Copper Inc.	Compliant	KOREA, REPUBLIC OF
Gold	Luoyang Zijin Yinhuai Gold Refinery Co., Ltd.	Outreach	CHINA
Gold	Materion	Compliant	UNITED STATES
Gold	Matsuda Sangyo Co., Ltd.	Compliant	JAPAN
Gold	Metalor Technologies (Hong Kong) Ltd.	Compliant	CHINA
Gold	Metalor Technologies (Singapore) Pte., Ltd.	Compliant	SINGAPORE
Gold	Metalor Technologies (Suzhou) Ltd.	Participating	CHINA
Gold	Metalor Technologies SA	Compliant	SWITZERLAND

<b>Metal</b>	<b>Smelter Name</b>	<b>Status*</b>	<b>Country</b>
Gold	Metalor USA Refining Corporation	Compliant	UNITED STATES
Gold	METALÚRGICA MET-MEX PEÑÓLES, S.A. DE C.V	Compliant	MEXICO
Gold	Mitsubishi Materials Corporation	Compliant	JAPAN
Gold	Mitsui Mining and Smelting Co., Ltd.	Compliant	JAPAN
Gold	MMTC-PAMP India Pvt., Ltd.	Compliant	INDIA
Gold	Morris and Watson	Outreach	NEW ZEALAND
Gold	Moscow Special Alloys Processing Plant	Compliant	RUSSIAN FEDERATION
Gold	Nadir Metal Rafineri San. Ve Tic. A.Ş.	Compliant	TURKEY
Gold	Navoi Mining and Metallurgical Combinat	Outreach	UZBEKISTAN
Gold	Nihon Material Co., Ltd.	Compliant	JAPAN
Gold	Ögussa Österreichische Gold- und Silber-Scheideanstalt GmbH	Compliant	AUSTRIA
Gold	Ohura Precious Metal Industry Co., Ltd.	Compliant	JAPAN
Gold	OJSC "The Gulidov Krasnoyarsk Non-Ferrous Metals Plant" (OJSC Krastsvetmet)	Compliant	RUSSIAN FEDERATION
Gold	OJSC Kolyma Refinery	Outreach	RUSSIAN FEDERATION
Gold	OJSC Novosibirsk Refinery	Compliant	RUSSIAN FEDERATION
Gold	PAMP SA	Compliant	SWITZERLAND
Gold	Penglai Penggang Gold Industry Co., Ltd.	Outreach	CHINA
Gold	Prioksky Plant of Non-Ferrous Metals	Compliant	RUSSIAN FEDERATION
Gold	PT Aneka Tambang (Persero) Tbk	Compliant	INDONESIA
Gold	PX Précinox SA	Compliant	SWITZERLAND
Gold	Rand Refinery (Pty) Ltd.	Compliant	SOUTH AFRICA
Gold	Republic Metals Corporation	Compliant	UNITED STATES
Gold	Royal Canadian Mint	Compliant	CANADA
Gold	Sabin Metal Corp.	Outreach	UNITED STATES
Gold	Samduck Precious Metals	Participating	KOREA, REPUBLIC OF
Gold	SAMWON Metals Corp.	Participating	KOREA, REPUBLIC OF
Gold	SAXONIA Edelmetalle GmbH	Outreach	GERMANY
Gold	Schone Edelmetaal B.V.	Compliant	NETHERLANDS
Gold	SEMPSA Joyería Platería SA	Compliant	SPAIN
Gold	Shandong Tiancheng Biological Gold Industrial Co., Ltd.	Outreach	CHINA
Gold	Shandong Zhaojin Gold & Silver Refinery Co., Ltd.	Compliant	CHINA
Gold	Sichuan Tianze Precious Metals Co., Ltd.	Compliant	CHINA
Gold	Singway Technology Co., Ltd.	Compliant	TAIWAN
Gold	So Accurate Group, Inc.	Outreach	UNITED STATES
Gold	SOE Shyolkovsky Factory of Secondary Precious Metals	Compliant	RUSSIAN FEDERATION
Gold	Solar Applied Materials Technology Corp.	Compliant	TAIWAN
Gold	Sumitomo Metal Mining Co., Ltd.	Compliant	JAPAN
Gold	T.C.A S.p.A	Compliant	ITALY
Gold	Tanaka Kikinzoku Kogyo K.K.	Compliant	JAPAN
Gold	The Refinery of Shandong Gold Mining Co., Ltd.	Compliant	CHINA

<b>Metal</b>	<b>Smelter Name</b>	<b>Status*</b>	<b>Country</b>
Gold	Tokuriki Honten Co., Ltd.	Compliant	JAPAN
Gold	Tongling Nonferrous Metals Group Co., Ltd.	Outreach	CHINA
Gold	Torecom	Participating	KOREA, REPUBLIC OF
Gold	Umicore Brasil Ltda.	Compliant	BRAZIL
Gold	Umicore Precious Metals Thailand	Compliant	THAILAND
Gold	Umicore SA Business Unit Precious Metals Refining	Compliant	BELGIUM
Gold	United Precious Metal Refining, Inc.	Compliant	UNITED STATES
Gold	Valcambi SA	Compliant	SWITZERLAND
Gold	Western Australian Mint trading as The Perth Mint	Compliant	AUSTRALIA
Gold	WIELAND Edelmetalle GmbH	Outreach	GERMANY
Gold	Yamamoto Precious Metal Co., Ltd.	Compliant	JAPAN
Gold	Yokohama Metal Co., Ltd.	Compliant	JAPAN
Gold	Yunnan Copper Industry Co., Ltd.	Outreach	CHINA
Gold	Zhongyuan Gold Smelter of Zhongjin Gold Corporation	Compliant	CHINA
Gold	Zijin Mining Group Co., Ltd. Gold Refinery	Compliant	CHINA
Tantalum	Changsha South Tantalum Niobium Co., Ltd.	Compliant	CHINA
Tantalum	Conghua Tantalum and Niobium Smeltry	Compliant	CHINA
Tantalum	D Block Metals, LLC	Compliant	UNITED STATES
Tantalum	Duoluoshan	Compliant	CHINA
Tantalum	Exotech Inc.	Compliant	UNITED STATES
Tantalum	F&X Electro-Materials Ltd.	Compliant	CHINA
Tantalum	FIR Metals & Resource Ltd.	Compliant	CHINA
Tantalum	Global Advanced Metals Aizu	Compliant	JAPAN
Tantalum	Global Advanced Metals Boyertown	Compliant	UNITED STATES
Tantalum	Guangdong Zhiyuan New Material Co., Ltd.	Compliant	CHINA
Tantalum	H.C. Starck Co., Ltd.	Compliant	THAILAND
Tantalum	H.C. Starck GmbH Goslar	Compliant	GERMANY
Tantalum	H.C. Starck GmbH Laufenburg	Compliant	GERMANY
Tantalum	H.C. Starck Hermsdorf GmbH	Compliant	GERMANY
Tantalum	H.C. Starck Inc.	Compliant	UNITED STATES
Tantalum	H.C. Starck Ltd.	Compliant	JAPAN
Tantalum	H.C. Starck Smelting GmbH & Co.KG	Compliant	GERMANY
Tantalum	Hengyang King Xing Lifeng New Materials Co., Ltd.	Compliant	CHINA
Tantalum	Hi-Temp Specialty Metals, Inc.	Compliant	UNITED STATES
Tantalum	Jiangxi Dinghai Tantalum & Niobium Co., Ltd.	Compliant	CHINA
Tantalum	Jiujiang JinXin Nonferrous Metals Co., Ltd.	Compliant	CHINA
Tantalum	Jiujiang Tanbre Co., Ltd.	Compliant	CHINA
Tantalum	Jiujiang Zhongao Tantalum & Niobium Co., Ltd.	Compliant	CHINA
Tantalum	KEMET Blue Metals	Compliant	MEXICO
Tantalum	KEMET Blue Powder	Compliant	UNITED STATES
Tantalum	King-Tan Tantalum Industry Ltd.	Compliant	CHINA

<b>Metal</b>	<b>Smelter Name</b>	<b>Status*</b>	<b>Country</b>
Tantalum	LSM Brasil S.A.	Compliant	BRAZIL
Tantalum	Metallurgical Products India Pvt., Ltd.	Compliant	INDIA
Tantalum	Mineração Taboca S.A.	Compliant	BRAZIL
Tantalum	Mitsui Mining & Smelting	Compliant	JAPAN
Tantalum	Molycorp Silmet A.S.	Compliant	ESTONIA
Tantalum	Ningxia Orient Tantalum Industry Co., Ltd.	Compliant	CHINA
Tantalum	Plansee SE Liezen	Compliant	AUSTRIA
Tantalum	Plansee SE Reutte	Compliant	AUSTRIA
Tantalum	QuantumClean	Compliant	UNITED STATES
Tantalum	Resind Indústria e Comércio Ltda.	Compliant	BRAZIL
Tantalum	RFH Tantalum Smeltry Co., Ltd.	Compliant	CHINA
Tantalum	Solikamsk Magnesium Works OAO	Compliant	RUSSIAN FEDERATION
Tantalum	Taki Chemicals	Compliant	JAPAN
Tantalum	Telex Metals	Compliant	UNITED STATES
Tantalum	Tranzact, Inc.	Compliant	UNITED STATES
Tantalum	Ulba Metallurgical Plant JSC	Compliant	KAZAKHSTAN
Tantalum	XinXing HaoRong Electronic Material Co., Ltd.	Compliant	CHINA
Tantalum	Yichun Jin Yang Rare Metal Co., Ltd.	Compliant	CHINA
Tantalum	Zhuzhou Cemented Carbide	Compliant	CHINA
Tin	Alpha	Compliant	UNITED STATES
Tin	An Vinh Joint Stock Mineral Processing Company	Participating	VIET NAM
Tin	Chenzhou Yunxiang Mining and Metallurgy Company Limited	Participating	CHINA
Tin	China Tin Group Co., Ltd.	Compliant	CHINA
Tin	CNMC (Guangxi) PGMA Co., Ltd.	Outreach	CHINA
Tin	Cooperativa Metalurgica de Rondônia Ltda.	Compliant	BRAZIL
Tin	CV Ayi Jaya	Compliant	INDONESIA
Tin	CV Dua Sekawan	Participating	INDONESIA
Tin	CV Gita Pesona	Compliant	INDONESIA
Tin	CV Serumpun Sebalai	Compliant	INDONESIA
Tin	CV United Smelting	Compliant	INDONESIA
Tin	CV Venus Inti Perkasa	Compliant	INDONESIA
Tin	Dowa	Compliant	JAPAN
Tin	Electro-Mechanical Facility of the Cao Bang Minerals & Metallurgy Joint Stock Company	Participating	VIET NAM
Tin	Elmet S.L.U. (Metallo Group)	Compliant	SPAIN
Tin	EM Vinto	Compliant	BOLIVIA
Tin	Estanho de Rondônia S.A.	Participating	BRAZIL
Tin	Feinhütte Halsbrücke GmbH	Participating	GERMANY
Tin	Fenix Metals	Compliant	POLAND
Tin	Gejiu Kai Meng Industry and Trade LLC	Participating	CHINA
Tin	Gejiu Non-Ferrous Metal Processing Co., Ltd.	Compliant	CHINA

<b>Metal</b>	<b>Smelter Name</b>	<b>Status*</b>	<b>Country</b>
Tin	Gejiu Yunxin Nonferrous Electrolysis Co., Ltd.	Outreach	CHINA
Tin	Gejiu Zili Mining And Metallurgy Co., Ltd.	Outreach	CHINA
Tin	Huichang Jinshunda Tin Co., Ltd.	Outreach	CHINA
Tin	Jiangxi Ketai Advanced Material Co., Ltd.	Compliant	CHINA
Tin	Linwu Xianggui Ore Smelting Co., Ltd.	Outreach	CHINA
Tin	Magnu's Minerai's Metais e Ligas Ltda.	Compliant	BRAZIL
Tin	Malaysia Smelting Corporation (MSC)	Compliant	MALAYSIA
Tin	Melt Metais e Ligas S/A	Compliant	BRAZIL
Tin	Metahub Industries Sdn. Bhd.	Outreach	MALAYSIA
Tin	Metallic Resources, Inc.	Compliant	UNITED STATES
Tin	Metallo-Chimique N.V.	Compliant	BELGIUM
Tin	Mineração Taboca S.A.	Compliant	BRAZIL
Tin	Minsur	Compliant	PERU
Tin	Mitsubishi Materials Corporation	Compliant	JAPAN
Tin	Nankang Nanshan Tin Manufactory Co., Ltd.	Outreach	CHINA
Tin	Nghe Tinh Non-Ferrous Metals Joint Stock Company	Participating	VIET NAM
Tin	O.M. Manufacturing (Thailand) Co., Ltd.	Compliant	THAILAND
Tin	O.M. Manufacturing Philippines, Inc.	Compliant	PHILIPPINES
Tin	Operaciones Metalurgical S.A.	Compliant	BOLIVIA
Tin	Phoenix Metal Ltd.	Participating	RWANDA
Tin	PT Alam Lestari Kencana	Outreach	INDONESIA
Tin	PT Aries Kencana Sejahtera	Compliant	INDONESIA
Tin	PT Artha Cipta Langgeng	Compliant	INDONESIA
Tin	PT ATD Makmur Mandiri Jaya	Compliant	INDONESIA
Tin	PT Babel Inti Perkasa	Compliant	INDONESIA
Tin	PT Bangka Kudai Tin	Outreach	INDONESIA
Tin	PT Bangka Prima Tin	Compliant	INDONESIA
Tin	PT Bangka Timah Utama Sejahtera	Outreach	INDONESIA
Tin	PT Bangka Tin Industry	Compliant	INDONESIA
Tin	PT Belitung Industri Sejahtera	Compliant	INDONESIA
Tin	PT BilliTin Makmur Lestari	Compliant	INDONESIA
Tin	PT Bukit Timah	Compliant	INDONESIA
Tin	PT Cipta Persada Mulia	Compliant	INDONESIA
Tin	PT DS Jaya Abadi	Compliant	INDONESIA
Tin	PT Eunindo Usaha Mandiri	Compliant	INDONESIA
Tin	PT Fang Di MulTindo	Outreach	INDONESIA
Tin	PT Inti Stania Prima	Compliant	INDONESIA
Tin	PT Justindo	Compliant	INDONESIA
Tin	PT Karimun Mining	Outreach	INDONESIA
Tin	PT Mitra Stania Prima	Compliant	INDONESIA
Tin	PT Panca Mega Persada	Compliant	INDONESIA

<b>Metal</b>	<b>Smelter Name</b>	<b>Status*</b>	<b>Country</b>
Tin	PT Pelat Timah Nusantara Tbk	Outreach	INDONESIA
Tin	PT Prima Timah Utama	Compliant	INDONESIA
Tin	PT Refined Bangka Tin	Compliant	INDONESIA
Tin	PT Sariwiguna Binasentosa	Compliant	INDONESIA
Tin	PT Seirama Tin Investment	Outreach	INDONESIA
Tin	PT Stanindo Inti Perkasa	Compliant	INDONESIA
Tin	PT Sukses Inti Makmur	Compliant	INDONESIA
Tin	PT Sumber Jaya Indah	Compliant	INDONESIA
Tin	PT Timah (Persero) Tbk Kunder	Compliant	INDONESIA
Tin	PT Timah (Persero) Tbk Mentok	Compliant	INDONESIA
Tin	PT Tinindo Inter Nusa	Compliant	INDONESIA
Tin	PT Tirus Putra Mandiri	Outreach	INDONESIA
Tin	PT Tommy Utama	Compliant	INDONESIA
Tin	PT Wahana Perkit Jaya	Compliant	INDONESIA
Tin	Resind Indústria e Comércio Ltda.	Compliant	BRAZIL
Tin	Rui Da Hung	Compliant	TAIWAN
Tin	Soft Metais Ltda.	Compliant	BRAZIL
Tin	Thaisarco	Compliant	THAILAND
Tin	Tuyen Quang Non-Ferrous Metals Joint Stock Company	Participating	VIET NAM
Tin	VQB Mineral and Trading Group JSC	Compliant	VIET NAM
Tin	White Solder Metalurgia e Mineração Ltda.	Compliant	BRAZIL
Tin	Yunnan Chengfeng Non-ferrous Metals Co., Ltd.	Participating	CHINA
Tin	Yunnan Tin Group (Holding) Company Limited	Compliant	CHINA
Tungsten	A.L.M.T. TUNGSTEN Corp.	Compliant	JAPAN
Tungsten	Asia Tungsten Products Vietnam Ltd.	Compliant	VIET NAM
Tungsten	Chenzhou Diamond Tungsten Products Co., Ltd.	Compliant	CHINA
Tungsten	Chongyi Zhangyuan Tungsten Co., Ltd.	Compliant	CHINA
Tungsten	Dayu Jincheng Tungsten Industry Co., Ltd.	Participating	CHINA
Tungsten	Dayu Weiliang Tungsten Co., Ltd.	Participating	CHINA
Tungsten	Fujian Jinxin Tungsten Co., Ltd.	Compliant	CHINA
Tungsten	Ganxian Shirui New Material Co., Ltd.	Outreach	CHINA
Tungsten	Ganzhou Huaxing Tungsten Products Co., Ltd.	Compliant	CHINA
Tungsten	Ganzhou Jiangwu Ferrotungsten Co., Ltd.	Compliant	CHINA
Tungsten	Ganzhou Non-ferrous Metals Smelting Co., Ltd.	Participating	CHINA
Tungsten	Ganzhou Seadragon W & Mo Co., Ltd.	Compliant	CHINA
Tungsten	Ganzhou Yatai Tungsten Co., Ltd.	Compliant	CHINA
Tungsten	Global Tungsten & Powders Corp.	Compliant	UNITED STATES
Tungsten	Guangdong Xianglu Tungsten Co., Ltd.	Compliant	CHINA
Tungsten	H.C. Starck GmbH	Compliant	GERMANY
Tungsten	H.C. Starck Smelting GmbH & Co.KG	Compliant	GERMANY
Tungsten	Hunan Chenzhou Mining Co., Ltd.	Compliant	CHINA



Tungsten	Hunan Chuangda Vanadium Tungsten Co., Ltd. Wuji	Compliant	CHINA
Tungsten	Hunan Chuangda Vanadium Tungsten Co., Ltd. Yanglin	Participating	CHINA
Tungsten	Hunan Chunchang Nonferrous Metals Co., Ltd.	Compliant	CHINA
Tungsten	Hydrometallurg, JSC	Compliant	RUSSIAN FEDERATION
Tungsten	Japan New Metals Co., Ltd.	Compliant	JAPAN
Tungsten	Jiangwu H.C. Starck Tungsten Products Co., Ltd.	Participating	CHINA
Tungsten	Jiangxi Gan Bei Tungsten Co., Ltd.	Compliant	CHINA
Tungsten	Jiangxi Minmetals Gao'an Non-ferrous Metals Co., Ltd.	Outreach	CHINA
Tungsten	Jiangxi Tonggu Non-ferrous Metallurgical & Chemical Co., Ltd.	Participating	CHINA
Tungsten	Jiangxi Xinsheng Tungsten Industry Co., Ltd.	Participating	CHINA
Tungsten	Jiangxi Xiushui Xianggan Nonferrous Metals Co., Ltd.	Compliant	CHINA
Tungsten	Jiangxi Yaosheng Tungsten Co., Ltd.	Participating	CHINA
Tungsten	Kennametal Fallon	Participating	UNITED STATES
Tungsten	Kennametal Huntsville	Compliant	UNITED STATES
Tungsten	Malipo Haiyu Tungsten Co., Ltd.	Compliant	CHINA
Tungsten	Niagara Refining LLC	Compliant	UNITED STATES
Tungsten	Nui Phao H.C. Starck Tungsten Chemicals Manufacturing LLC	Compliant	VIET NAM
Tungsten	Pobedit, JSC	Participating	RUSSIAN FEDERATION
Tungsten	Sanher Tungsten Vietnam Co., Ltd.	Participating	VIET NAM
Tungsten	Tejing (Vietnam) Tungsten Co., Ltd.	Compliant	VIET NAM
Tungsten	Vietnam Youngsun Tungsten Industry Co., Ltd.	Compliant	VIET NAM
Tungsten	Wolfram Bergbau und Hütten AG	Compliant	AUSTRIA
Tungsten	Xiamen Tungsten (H.C.) Co., Ltd.	Compliant	CHINA
Tungsten	Xiamen Tungsten Co., Ltd.	Compliant	CHINA
Tungsten	Xinhai Rendan Shaoguan Tungsten Co., Ltd.	Compliant	CHINA

Countries of origin for the minerals processed by these smelters may include:

Gold	Argentina, Australia, Austria, Belgium, Bolivia, Brazil, Cambodia, Canada, Chile, China, Colombia, Côte D'Ivoire, Czech Republic, Djibouti, Egypt, Estonia, Ethiopia, France, Germany, Guyana, Hungary, India, Indonesia, Ireland, Israel, Japan, Kazakhstan, Laos, Luxembourg, Madagascar, Malaysia, Mongolia, Myanmar, Namibia, Netherlands, Nigeria, Peru, Portugal, Russia, Sierra Leone, Singapore, Slovakia, South Korea, Spain, Suriname, Switzerland, Taiwan, Thailand, United Kingdom, United States, Vietnam, Zimbabwe, and recycled or scrap sources
Tantalum	Angola, Argentina, Australia, Austria, Belgium, Bolivia, Brazil, Burundi, Cambodia, Canada, Central African Republic, Chile, China, Colombia, Côte D'Ivoire, Czech Republic, Democratic Republic of Congo, Djibouti, Egypt, Estonia, Ethiopia, France, Germany, Guyana, Hungary, India, Indonesia, Ireland, Israel, Japan, Kazakhstan, Kenya, Laos, Luxembourg, Madagascar, Malaysia, Mongolia, Mozambique, Myanmar, Namibia, Netherlands, Nigeria, Peru, Portugal, Republic of Congo, Russia, Rwanda, Sierra Leone, Singapore, Slovakia, South Africa, South Korea, South Sudan, Spain, Suriname, Switzerland, Taiwan, Tanzania, Thailand, Uganda, United Kingdom, United States, Vietnam, Zambia, Zimbabwe, and recycled or scrap sources
Tin	Angola, Argentina, Australia, Austria, Belgium, Bolivia, Brazil, Burundi, Cambodia, Canada, Central African Republic, Chile, China, Colombia, Côte D'Ivoire, Czech Republic, Democratic Republic of Congo, Djibouti, Egypt, Estonia, Ethiopia, France, Germany, Guyana, Hungary, India, Indonesia, Ireland, Israel, Japan, Kazakhstan, Kenya, Laos, Luxembourg, Madagascar, Malaysia, Mongolia, Mozambique, Myanmar, Namibia, Netherlands, Nigeria, Peru, Portugal, Republic of Congo, Russia, Rwanda, Sierra Leone, Singapore, Slovakia, South Africa, South Korea, South Sudan, Spain, Suriname, Switzerland, Taiwan, Tanzania, Thailand, Uganda,

United Kingdom, United States, Vietnam, Zambia, Zimbabwe, and recycled or scrap sources

**Tungsten** Angola, Argentina, Australia, Austria, Belgium, Bolivia, Brazil, Burundi, Cambodia, Canada, Central African Republic, Chile, China, Colombia, Côte D'Ivoire, Czech Republic, Democratic Republic of Congo, Djibouti, Egypt, Estonia, Ethiopia, France, Germany, Guyana, Hungary, India, Indonesia, Ireland, Israel, Japan, Kazakhstan, Laos, Luxembourg, Madagascar, Malaysia, Mongolia, Myanmar, Namibia, Netherlands, Nigeria, Peru, Portugal, Republic of Congo, Russia, Rwanda, Sierra Leone, Singapore, Slovakia, South Korea, South Sudan, Spain, Suriname, Switzerland, Taiwan, Tanzania, Thailand, Uganda, United Kingdom, United States, Vietnam, Zambia, Zimbabwe, and recycled or scrap sources

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